

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**BRIAN P. MANOOKIAN,**

**Plaintiff,**

**v.**

**NO: 3:19-cv-0350**

**FLOYD FLIPPIN, in his official and  
individual capacities; DANA DYE, in her  
official and individual capacities; JOHN  
KITCH, in his official and individual  
capacities; JOE LOONEY, in his official  
and individual capacities; ODELL  
HORTON, JR., in his official and  
individual capacities; RUTH ELLIS, in  
her official and individual capacities;  
JODY PICKINS, in her official and  
individual capacities; BRIDGET J.  
WILLHITE, in her official and individual  
capacities; and JIMMIE MILLER, in her  
official and individual capacities,**

**Defendants.**

---

**NOTICE OF WITHDRAWAL OF COUNSEL FOR ALL DEFENDANTS**

---

The undersigned hereby gives notice of his individual withdrawal as counsel for all defendants in both their official and their individual capacities. The office of the Tennessee Attorney General will continue to represent all defendants. Jonathan N. Wike, Senior Assistant Attorney General, filed a notice of appearance of lead counsel on June 22, 2020, at Document 63.

Respectfully Submitted,

HERBERT H. SLATERY III  
Attorney General and Reporter

/s/Talmage M. Watts  
TALMAGE M. WATTS (#015298)  
Senior Assistant Attorney General  
Attorney General's Office – Tax Division  
P.O. Box 20207  
Nashville, TN 37202-0207  
(615) 741-6431 telephone  
(615) 532-2571 fax  
[talmage.watts@ag.tn.gov](mailto:talmage.watts@ag.tn.gov)

*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Notice of Withdrawal has been served on all persons listed below by means of the Court's electronic notification system.

Daniel Horwitz (#032176)  
1803 Broadway, Suite #531  
Nashville, TN 37203  
[daniel.a.horwitz@gmail.com](mailto:daniel.a.horwitz@gmail.com)

*Local Pro Bono Counsel for Plaintiff*

Jonathan N. Wike  
Senior Assistant Attorney General  
Attorney General's Office  
P.O. Box 20207  
Nashville, TN 37202-0207  
(615) 741-7404 telephone  
(615) 532-2571 fax  
[jon.wike@ag.tn.gov](mailto:jon.wike@ag.tn.gov)

*Counsel for Defendants*

Jarod Bona  
Aaron Gott  
David C. Codell, of counsel  
BONA LAW PC  
4275 Executive Square, Suite 200  
La Jolla, CA 92037  
[jarod.bona@bonalawpc.com](mailto:jarod.bona@bonalawpc.com)  
[aaron.gott@bonalawpc.com](mailto:aaron.gott@bonalawpc.com)  
[david@codell.com](mailto:david@codell.com)

*Counsel for Plaintiff*

on this the 29th day of June 2020.

/s Talmage M. Watts  
TALMAGE M. WATTS  
Senior Assistant Attorney General